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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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In the Matter of

1998 Biennial Regulatory Review --  
Amendment of Part 97 of the Commission's  
Amateur Service Rules.

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WT Docket No. 98-143

## COMMENTS ON PROPOSED RULEMAKING

Date: 28 August 1998

Comments of: Gunnar C. Carlson Jr.

### I. INTRODUCTION

1. I am an Extra class Amateur operator. I was first licensed in 1958. I am a Volunteer Examiner and a member of The FCC Amateur Auxiliary as an Official Observer. I am a member of the American Radio Relay League (ARRL).

### II. EXECUTIVE SUMMARY

2. In these comments, I propose the following changes to, or comments on, WT Docket No. 98-143.

- Do not lower telegraphy testing speed requirements (13 and 20 words per minute).
- Keep the Novice bands as CW only and increase power allowed to 1500 watts PEP.
- Require one minute of solid perfect copy to pass a CW examination.
- Eliminate published question pools.
- Establish FCC review of Amateur question pools to eliminate foolish questions.
- Do not accept ARRL as the leading representative for US Amateurs in this matter.
- I agree with elimination of Novice and Technician Plus classes of license.
- I agree with Advanced class VE's giving up to General Class examinations.
- FCC must fix the medical waiver for telegraphy as it is being badly abused.

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- A way to improve the effectiveness of the FCC Amateur Auxiliary.

### **A. TELEGRAPHY EXAMINATION REQUIREMENTS**

3. A trained pool of Morse code (CW) operators is a valuable national resource. CW can communicate in emergency situations when no other form of communications will work. That is why the Army Special Forces (Green Berets) train and use CW operationally. As some other agencies eliminate CW, the Amateur CW operators become even more critically needed for communications emergencies.
4. CW speeds of thirteen (13) words per minute (WPM) are necessary as this is the average conversational speed used by CW operators. Twenty (20) WPM is appropriate for the Extra class license which is only exclusively granted small segments of HF spectrum. Operators who are not willing to exert the effort and time to attain twenty (20) WPM are not being denied much frequency spectrum. They are mainly denied short call signs. The Central Intelligence and National Security Agencies still recruit CW operators capable of twenty (20) WPM or higher, and would not like to see this standard lowered.
5. Please do not lower the standards for Amateur radio licenses by lowering CW code speed standards. Remember the mess you created with the Citizen's band -- unusable frequency spectrum, foul language, illegal equipment, etc. This was all due to low licensing standards! The more effort required to attain a license, the more respect given to the rules and regulations for that license. The pressure to reduce Amateur standards is coming from equipment retailers who believe more ham licenses mean more Japanese radios will be sold.
6. I agree that the entry level HF code speed should be 13 WPM for the General class license, but if the commercial / ARRL pressure is so great that you feel compelled to lower code speeds, I would grudgingly accept 10 WPM for General class, 15 WPM for Advanced class and 20 WPM for Extra class. Ten (10) WPM is below the learning plateau which most people experience while learning code and can be learned quickly.
7. The code examination requirement should consist of one minute of perfect copy out of five minutes of text. No ten (10) question examination, and especially no multiple choice examinations (25% chance of guessing correctly) which currently exists. No dots and dashes should be allowed in the code copy. That is not copying by ear.
8. The argument that CW should be eliminated as an Amateur license requirement because it is not used by commercial or government communicators is very flawed. As I have already mentioned the US Government (CIA, NSA and Special Forces) still need CW operators and still use CW. Foreign governments and shipping still send distress signals in CW even though the US has foolishly abandoned CW in it's shipping industry and Coast Guard. US Amateurs should be able to help an international station calling for help in Morse code.

9. Remember that while Amateur radio is a Service, it is manned by hobbyists who enjoy using CW. The elimination of commercial and military sail boats did not kill sailing as a hobby or eliminate the requirement for licensing of sail boats or masters of sailing vessels carrying passengers!

## **B. THE ARRL**

10. The ARRL appears to now represent the commercial interests who advertise in its' magazine more than its' membership, which overwhelmingly wants the CW standards left alone. You should note that only about 1/4 of the Amateurs in America are ARRL members. The letter you received from the ARRL on this issue certainly does not represent even the 1/4 who are members. The ARRL officers are not elected by the membership but are appointed by the board of directors (6 of 15 of whom voted against the letter). 63% of ARRL members and 54% of non members have voted to leave the international CW requirement as is. The ARRL says its' recent survey shows 41% of its' members want the 20 WPM code speed requirement reduced. They failed to say that 71% expressing this desire hold general or advanced class licenses and aspire to an easier upgrade to extra class. 59% of Extra class licensees supported the 20 WPM requirement. The bottom line is that a survey can be designed to give any desired result!

## **C. AMATEUR RADIO WRITTEN EXAMINATIONS**

11. The current Amateur written examinations only require memory and no real technical knowledge. Some questions are "giveaways" such as:

(N1113) When may an Amateur station transmit Mayday or SOS?

- a. 15 and 30 minutes after the hour
- b. Never
- c. During a severe weather watch
- d. In an emergency

(N5B06) How much voltage does an automobile battery usually supply?

- a. 120 volts
- b. 30 volts
- c. 12 volts
- d. 240 volts

(N5C07) If you have light bulbs marked 60 watts, 75 watts and 100 watts which will use more electrical energy in one hour?

- a. the 75 watt bulb
- b. the 100 watt bulb
- c. the 60 watt bulb
- d. they will all be the same

The FCC should establish a review procedure over these question pools to eliminate questions such as these. Question pools should not be published. Only subject areas and sample questions to encourage study and real understanding of the principles involved.

12. Having separate examinations for element 2 and 3A is no burden to the Volunteer Examiners,

#### **D. ELIMINATION OF NOVICE AND TECHNICIAN PLUS**

13. I agree with the elimination of Novice and Technician Plus licenses as long as you don't lower the standard for General class CW or written examinations. However, if you eliminate the 5 WPM CW exam, what CW will the candidates with doctors certification be required to pass? They now must have passed 5 WPM.

#### **E. MORE AUTHORITY FOR ADVANCED CLASS VEs**

14. I agree that advanced class VEs be allowed to administer examinations up to and including general class. VEs who received credit for CW by a doctor's certification must not be allowed to administer the code tests which they have never passed. They could play an incorrect code tape and never realize their mistake.

#### **F. FRAUD IN DOCTOR CERTIFICATIONS FOR CODE**

15. FCC must do something to stop fraud in doctor's certification code candidates. 8% of CW is credited this way. Candidates must attempt some form of code test before using the doctor's certificate.

#### **G. DISPOSITION OF NOVICE CW BANDS**

16. The current CW bands are crowded. The ARRL survey indicated that 64% of its' members use CW. At any given moment one can find more activity on CW than SSB on any band except UHF and VHF. Those who claim otherwise are simply wrong. Therefore the novice CW bands should remain exclusively for CW with a power limitation of 1500 watts PEP for all users, including novices.

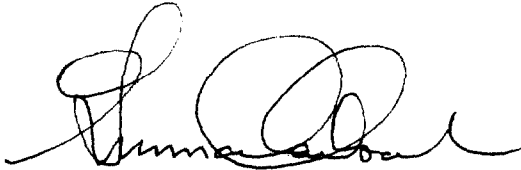
#### **H. BETTER USE OF THE FCC AMATEUR AUXILLERY**

17. Providing Official Observers with an FCC form upon which to notify stations of violations, instead of the ARRL form currently used, would go a long way toward preventing recurrence of violations. An ARRL form is ignored by most violators.

### **III CONCLUSION**

When it comes to a choice between preserving the valuable pool of CW operators as a National resource for emergencies, and as a source of operators for Government and military communication; OR lowering the standards for Amateur radio to sell more

Japanese radios and further skew the balance of trade, and create chaos on the bands like was done on the Citizens Band, I think the choice is clear. Do not eliminate or lower Morse Code standards for Amateur radio or eliminate CW frequencies.

A handwritten signature in black ink, appearing to read 'Gunnar C. Carlson Jr.', with a stylized, cursive script.

Gunnar C. Carlson Jr.  
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